

Docket UE-161204

Yakama Power's Response to Pacific Power Data Request Set 1 (Nos.

May 12, 2017)

PACIFIC POWER DATA REQUEST NO. 11 TO YAKAMA POWER:

If YP has ever discussed with representatives of the Bureau of Indian Affairs (BIA) or the Department of Interior whether it can prevent the imposition of costs by Pacific Power for removal of Pacific Power's facilities by simply demanding that Pacific Power property remove its assets from an allegedly unapproved right-of-way over Trust property, set forth the following:

- a. the individuals who participated in each communication;
- b. the date of each communication;
- c. the particular substance of each communication; and
- d. whether such communication was in any way memorialized in written form and, if so, identify the document.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 11:

Yakama Power objects to Pacific Power Data Request No. 11 as overly broad, unduly burdensome and vague. Yakama Power further objects on the basis that the information requested is not relevant to the "primary issue in this proceeding [which] relates to the rates, terms, and conditions of [Pacific Power's] proposed tariff filings",^{17/} is not reasonably calculated to lead to the discovery of admissible evidence, and seeks the production of confidential information not subject to disclosure to Pacific Power in this proceeding.^{18/}

Without waiving the foregoing objections, Yakama Power responds as follows:

Ray Wiseman has had such discussions with the BIA Superintendent of the Yakama Field Office, David Shaw. Mr. Shaw provided an unsigned copy of the letter that he sent PacifiCorp, Attachment A. Management is unaware of any response from PacifiCorp to this BIA letter.

Date Response Prepared: May 12, 2017
Witness: Ray Wiseman
Preparer: J.D. Williams
Preparer Telephone No.: 971-404-9081

^{17/} Order 04 ¶ 12 (Jan. 4, 2017).

^{18/} Order 05 ¶ 4-5 (Jan. 19, 2017).

Despite Yakama Power's diligent efforts, certain information protected from disclosure by attorney-client privilege or other applicable privileges or law may have been included in response to these data requests. Accordingly, Yakama Power reserves its right to seek the return of any privileged or protected materials that may have been inadvertently disclosed, and respectfully advise that any inadvertent disclosure should not be considered a waiver of any applicable privileges or rights. Yakama Power respectfully requests that you inform Yakama Power immediately if you become aware of any such materials in these responses.